

## INITIAL STATEMENT OF REASONS

### REVISIONS TO THE CALIFORNIA BUILDING ENERGY EFFICIENCY STANDARDS CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 6, SECTION 118(i)3 (California Energy Code)

#### COOL ROOF COATINGS PERFORMANCE REQUIREMENTS

#### STATEMENT OF SPECIFIC PURPOSE AND RATIONALE

Section 118(i)3, Table 118-C

On April 4, 2005, the Energy Commission received a petition to change the adopted performance requirements in the 2005 Building Energy Efficiency Standards, Section 118(i)3 and Table 118-C, for qualifying liquid field-applied cool roof coatings as cool roofs. The petitioners, a consortium of 24 manufacturers led by National Coatings Corporation, claim that the 2005 adopted test approach for low temperature performance unnecessarily restricts the qualified cool roof coatings to only those that meet minimum elongation (stretching until breakage) requirements at 0°F; and that other coating products that can not meet the minimum elongation requirements are durable and perform fully satisfactorily in California climate conditions, including in California climates with very cold winters. The petitioners propose that the Commission add an alternate test approach that tests for minimum flexibility rather than minimum elongation at low temperatures. This would enable many more coatings that, the petitioners claim, still perform well in California climates to be used in California as cool roof products. Previously, on March 17, 2005, Energy Commission staff received a letter from the Roof Coating Manufacturers Association (RCMA) regarding the same section, Section 118(i)3, Table 118-C. RCMA requested that the Energy Commission eliminate the physical performance requirements for liquid-applied cool roof coatings in Section 118(i)3.

On April 13, 2005, the Energy Commission accepted the National Coatings Corporation consortium's petition to initiate a rulemaking proceeding on the changes proposed above. During this proceeding the Energy Commission also will consider the comments from the Roof Coating Manufacturers Association.

#### DOCUMENTS RELIED UPON

Letter from William Kirn, National Coatings Corporation, and 23 other roof coatings manufacturers, *Petition for Adoption of an Alternate Test for Liquid Applied Roof Coatings to Meet the Cool Roof Requirements of the 2005 Building Energy Efficiency Standards (Title 24, Part 6, § 118(i)3 and Table 118-C)*, dated March 28, 2005.

American Society of Testing and Materials (ASTM) D2370-98 (2002), *Standard Test Method for Tensile Properties of Organic Coatings*.

ASTM D522-93a (2001), *Standard Test Methods for Mandrel Bend Test of Attached Organic Coatings*.

## **CONSIDERATION OF REASONABLE ALTERNATIVES**

The Commission has considered two possible alternatives to the proposed changes: 1) eliminate the physical performance requirements for liquid-applied coatings in their entirety, and 2) make no changes to the current Standards. The Commission believes it is critically important to have physical performance requirements for coatings to insure that the coatings are durable and reliably achieve the energy savings expected for cool roofs. Based on information received to date the Commission believes that the recommendations for adding an alternate testing approach in the proposed changes are reasonable.

## **REASONABLE ALTERNATIVES THE AGENCY HAS IDENTIFIED THAT WOULD LESSEN ANY ADVERSE IMPACT ON SMALL BUSINESS**

The Commission has determined that the proposed changes will not have an adverse impact on businesses of any size, including small businesses.

## **FACTS, EVIDENCE, DOCUMENTS, TESTIMONY, OR OTHER EVIDENCE OF NO SIGNIFICANT ADVERSE IMPACT OF BUSINESS**

The proposed changes to the regulations do not change the energy efficiency requirements of public or private building owners. By adding an alternate testing approach, the changes merely add flexibility to the requirements that must be met by roof coating manufacturers to insure durability of those products to achieve the expected energy savings of the Standards. This results in less restrictive regulations while still accomplishing the energy savings expected by the Standards. This additional flexibility could not possibly cause a significant adverse impact on businesses.

## **DUPLICATION OR CONFLICTS WITH FEDERAL REGULATIONS**

The rulemaking proceeding will not duplicate or conflict with federal regulations.